

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,	)	
	)	CIVIL ACTION NO.
	)	
Plaintiff,	)	
	)	PLAINTIFF’S <i>EX PARTE</i> MOTION
	)	FOR A TEMPORARY RESTRAINING
v.	)	ORDER FREEZING ASSETS,
	)	APPOINTING A RECEIVER,
	)	EXPEDITING DISCOVERY, AND
DAVISON & ASSOCIATES, INC., a corporation,	)	FOR AN ORDER TO SHOW CAUSE
GEORGE M. DAVISON, III, individually,	)	WHY A PRELIMINARY
THOMAS DOWLER, individually,	)	INJUNCTION SHOULD NOT ISSUE
	)	
Defendants.	)	
	)	
	)	
	)	

Plaintiff Federal trade Commission (“Commission”), pursuant to Rule 65(b) of the Federal Rules of Civil Procedure, moves this court for a Temporary Restraining Order *ex parte* against all defendants freezing their assets, appointing a receiver, expediting discovery, and for an order to show cause why a preliminary injunction should not issue.

In support of its Motion, the Commission states that defendants have engaged and continue to engage in acts and practices that violate Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45. Specifically, defendants sell invention marketing services by grossly exaggerating their industry contacts, their history of past success, and their expertise. Further, the Commission submits its Brief in support of this Motion and the Complaint filed in this matter. As set forth in the Complaint and accompanying Brief and exhibits, advance notice to defendants may result in dissipation or

concealment of assets and the destruction of documents. Such actions would cause immediate and irreparable harm by impeding the Commissions' efforts to redress consumer injury. Issuing the Temporary Restraining Order and asset freeze will preserve the possibility of full and effective relief by maintaining the *status quo* pending the hearing on the Order to Show Cause Why a Preliminary Injunction Should Not Issue. Because the Commission seeks to avoid any notice to defendants that might result in a dissipation or concealment of assets or documents, it is also filing concurrently a Motion for an Order to file all documents in this matter under a temporary seal.

DATED: \_\_\_\_\_

Respectfully submitted,

STEPHEN CALKINS  
General Counsel

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